

Construction Notice for South Canton – West Canton 138 kV Transmission Line Cut- In (Reedurban) Project



An **AEP** Company

BOUNDLESS ENERGYSM

PUCO Case No. 25-0093-EL-BNR

Submitted to:
The Ohio Power Siting Board
Pursuant to Ohio Administrative Code
Section 4906-6-05

Submitted by:
Ohio Power Company

April 16, 2025

**CONSTRUCTION NOTICE FOR THE SOUTH CANTON – WEST CANTON 138 KV TRANSMISSION LINE
CUT-IN (REEDURBAN) PROJECT**

CONSTRUCTION NOTICE

Ohio Power Company

South Canton – West Canton 138 kV Transmission Line Cut-In (Reedurban) Project

4906-6-05 Accelerated Application Requirements

Ohio Power Company (the Company) provides the following information to the Ohio Power Siting Board (OPSB) in accordance with the accelerated application requirements of Ohio Administrative Code Section 4906-6-05.

4906-6-05(B) General Information

B(1) Project Description

The name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Construction Notice.

The Company proposes to construct the South Canton-West Canton 138 kV Transmission Line Cut-In (Reedurban) Project (the “Project”), located within the municipality of Reedurban southwest of the City of Canton, in Perry Township, Stark County, Ohio. The Project requires adjusting the existing South Canton-West Canton 138 kV Line into Reedurban Station, a step-down distribution station. The Project also involves creating a second line entrance into the Reedurban Station by cutting into the existing South Canton – West Canton 138 kV Transmission Line and constructing a, less than 0.1 mile, greenfield 138 kilovolt (kV) transmission line span. The Project will primarily be constructed within the existing right-of-way (“ROW”), however, a new easement will be required. The location of the Project is shown on Figures 1 and 2 in **Appendix A**.

The Project meets the requirements for a Construction Notice (CN) because it is within the types of projects defined by item 1(a) of Ohio Administrative Code Section 4906-1-01, Appendix A of the *Application Requirement Matrix for Electric Power Transmission Lines*:

(1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:

(a) Line(s) not greater than 0.2 miles in length.

The Project has been assigned Public Utilities Commission of Ohio Case No. 25-0093-EL-BNR.

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B(2) Statement of Need

If the proposed project is an electric power transmission line or gas pipeline, the applicant provides a statement explaining the need for the proposed facility.

The Project is required in connection with upgrades at the stepdown distribution station, Reedurban. Reedurban Station has a number of equipment conditions and operational flexibility needs that require attention. The existing South Canton-West Canton 138 kV Transmission Line (specifically the Miles Avenue-Reedurban-South Canton 138 kV circuit) is a 3-terminal line, due to the 138-69 kV transformer source at Reedurban Station, and the lack of 138 kV circuit breakers at Reedurban Station. The station currently has only motor-operated switches, requiring remote-end breaker operation at Miles Avenue and South Canton stations, which drops distribution customers served out of Negley Station in the process.

To address the concerns at Reedurban Station, new circuit breakers and protective relays will be installed, which will help sectionalize the transmission grid in the area. To accomplish these upgrades, the South Canton-West Canton 138 kV Transmission Line must be reconfigured at Reedurban Station, to connect to the new 138 kV station structures. This is part of a comprehensive area transmission upgrade, which will improve service for the Marathon Petroleum refinery, along with other transmission and distribution customers in the area.

Failure to move forward with this project will continue to expose customers served from the transmission line to outages due to lack of current sectionalizing and the continued risk of mis-operations due to the three-terminal line.

This is a PJM Supplemental upgrade (s2822) which was presented to PJM at the 9/16/2022 Subregional RTEP Western meeting. The Reedurban Station work was inadvertently omitted from the 2023 Long Term Forecast Report (LTFR) but will be included in the 2024 LTFR.

B(3) Project Location

Provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the Project area.

Figures 1 and 2 in Appendix A show the location of the proposed Project in relation to existing substation and transmission lines.

B(4) Alternatives Considered

Describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility, including but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

Due to the location of the existing facilities, the short transmission line length, and minimal land use impacts in the Project area, no other alternatives were considered for the Project. Any other alternative would add additional length to the Project without any additional benefit. This alternative

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is located within maintained lawn and industrial land (the existing graveled substation) with no impacts to wetlands, streams, or known cultural resource areas. There are four residences located within 100 feet of the Project, but these residences are within 100 feet of the existing South Canton-West Canton 138 kV Transmission Line. Therefore, this Project represents the most suitable location and is the most appropriate solution for meeting the Company needs in the area.

B(5) Public Information Program

Describe its public information program to inform affected property owners and residents of the nature of the project and the proposed timeframe for project construction and restoration activities.

The Company maintains a website (<http://aeptransmission.com/ohio/>) on which an electronic copy of this CN is available. An electronic copy of the CN will be served to the public library in each political subdivision affected by this Project. The Company also retains land agents who will discuss Project timelines, construction and restoration activities with affected owners and tenants.

B(6) Construction Schedule

Provide an anticipated construction schedule and proposed in-service date of the project.

Construction of the Project is planned to begin in August 2025 with an anticipated in-service date of April 2026.

B(7) Area Map

Provide a map of at least 1:24,000 scale clearly depicting the facility and proposed limits of disturbance with clearly marked streets, roads, and highways, and an aerial image.

Figure 1, in Appendix A, identifies the location of the Project area on the Canton West, Ohio United States Geological Survey 1:24,000 quadrangle map. **Appendix A, Figure 2** displays the Project components on a 2023 aerial photograph.

B(8) Property Agreements

Provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

A list of properties required for the Project is provided in the table below.

Table 1 – Property Agreements for the South Canton – West Canton 138 kV Transmission Line Cut-In (Reedurban) Project

**CONSTRUCTION NOTICE FOR THE SOUTH CANTON – WEST CANTON 138 KV TRANSMISSION LINE
CUT-IN (REEDURBAN) PROJECT**

Property Parcel Number	Agreement Type	Easement or Option Obtained (Yes/No)
4300702	Existing Rights	N/A- existing
4316239	New Easement	No
4316217	Ohio Power Company Owned	N/A

The easement form exhibit provided in **Appendix C** represents the minimum rights the Company would require in order to construct, operate, and maintain these facilities.

B(9) Technical Features

Describe the following information regarding the technical features of the project:

B(9)(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

The transmission line is estimated to include the following:

Line Asset Name: South Canton – Weston Canton 138 kV Line
Ownership: Ohio Power Company
Voltage: 138 kV
Conductors: 795 KCMIL 45/7 TERN
Static Wire: 7#10 Alumoweld
Insulators: Polymer
ROW Width: 70 Feet
Structure Type: (1) Double Circuit Davit Arm Dead-End

B(9)(b) Electric and Magnetic Fields

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line.

The Project is located within 100 feet of four occupied residence and no occupied multifamily dwellings or institutions.

B(9)(b)(i) Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way for:

i) Calculated Electric and Magnetic Field Levels

Three loading conditions were examined: (1) Normal Maximum Loading, (2) Emergency Loading, and (3) Winter Normal Conductor Rating, consistent with the OPSB requirements. Normal Maximum Loading represents the peak flow expected with all system facilities in service; daily/hourly flows

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fluctuate below this level. Emergency loading is the maximum current flow during unusual (contingency) conditions, which exist only for short periods of time. Winter normal (WN) conductor rating represents the maximum current flow that a line, including its terminal equipment, can carry during winter conditions. It is not anticipated that this circuit of line would operate at its WN rating in the foreseeable future.

Electric and magnetic field (EMF) levels were computed one meter above ground under the line and at the ROW edges (35/35 feet, left/right, of centerline). The results, calculated using Electric Power Research Institute's (EPRI's) EMF Workstation 2015 software, are summarized below.

**Table 2 - EMF Calculations for the South Canton – West Canton 138 kV Transmission Line
Cut-In (Reedurban) Project**

South Canton – Reedurban					
Condition	Phase Current (A)	Phasing (top to bottom)	Ground Clearance (feet)	Electric Field (kV/m)*	Magnetic Field (mG)*
(1) Normal Max. Loading[^]	918 (left) 1050 (right)	C-B-A C-B-A	39/41	(0.63/1.64/0.63)	(84/118/87)
(2) Emergency Line Loading^{^^}	1066 (left) 1402 (right)	C-B-A C-B-A	38/40	(0.63/1.70/0.63)	(106/154/114)
(3) Winter Conductor Rating^{^^^}	1268 (left) 1594 (right)	C-B-A C-B-A	38/40	(0.63/1.70/0.63)	(123/179/131)

Reedurban – West Canton					
Condition	Phase Current (A)	Phasing (top to bottom)	Ground Clearance (feet)	Electric Field (kV/m)*	Magnetic Field (mG)*
(1) Normal Max. Loading[^]	918 (left) 918 (right)	C-B-A C-B-A	37/40	(0.63/1.64/0.63)	(79/110/79)
(2) Emergency Line Loading^{^^}	1066 (left) 1066 (right)	C-B-A C-B-A	36/39	(0.63/1.70/0.63)	(95/132/95)
(3) Winter Conductor Rating^{^^^}	1268 (left) 1268 (right)	C-B-A C-B-A	36/39	(0.63/1.70/0.63)	(113/157/113)

*EMF levels (left ROW edge/maximum/right ROW edge) computed one meter above ground at the point of minimum ground clearance, assuming balanced phase currents and 1.0 P.U. Voltages. ROW width is 35 feet (left) and 35 feet (right) of centerline, respectively.

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^Peak line flow expected with all system facilities in service.

^^Maximum flow during a critical system contingency

^^^Maximum continuous flow that the line, including its terminal equipment, can withstand during winter conditions.

For power-frequency EMF, IEEE Standard C95.6TM-2002 recommends the following limits:

	General Public	Controlled Environment
	-----	-----
Electric Field Limit (kV/m)	5.0	20.0
Magnetic Field Limit (mG)	9,040	27,100

The above EMF levels are well within the limits specified in IEEE Standard C95.6TM-2002. Those limits have been established to "prevent harmful effects in human beings exposed to electromagnetic fields in the frequency range of 0-3 kHz."

B(9)(b)(ii) Design Alternatives

The applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

Design alternatives were not considered due to EMF strength levels. Transmission lines, when energized, generate EMF. Laboratory studies have failed to establish a strong correlation between exposure to EMF and effects on human health. However, some people are concerned that EMF have impacts on human health. Due to these concerns, EMF associated with the new circuits was calculated and set forth in the table above. The EMF was computed in a manner to maximize the estimate, assuming the highest reasonable input values based on conditions along the proposed transmission line rebuild. Normal daily EMF levels would be less than these, which were calculated at maximum load conditions. Based on studies from the National Institutes of Health, the magnetic field (measured in milliGauss, or mG) associated with emergency loading at the highest EMF value for this transmission line is lower than those associated with normal household appliances like microwave ovens, electric shavers and hair dryers. For additional information regarding EMF, the National Institutes of Health has posted information on their website:

<http://www.niehs.nih.gov/health/topics/agents/emf/>. Additionally, information on electric and magnetic fields is available on the Company's website:

<https://www.aepohio.com/community/education/emf>. The information found on the Company's website describes the basics of electromagnetic field theory, scientific research activities, and EMF exposures encountered in everyday life. Similar material will be made available for those affected by the construction activities for this Project.

B(9)(c) Project Cost

The estimated capital cost of the project.

The cost estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$980,000 using a Class 4 estimate. Pursuant to the PJM OATT, the costs for this

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Project will be recovered in the Ohio Power Company FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Ecological Impacts

The applicant shall describe the social and ecological impacts of the project:

B(10)(a) Land Use

Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

The Project is located primarily within the Company's property and/or existing Ohio Power Company easements in the municipality of Reedurban, west of the City of Canton, in Perry Township, Stark County, Ohio. Field observations by the Company's consultant indicate that the Project area is comprised primarily of maintained lawn and industrial land (i.e., Reedurban Station). The Ecological Survey Report included in Appendix E also contains photographs and descriptions of specific habitat types and land uses within the Project area. The Project area is surrounded by residential development to the north, west and east. Woodlots and industrial development is located south of the Project area. There are no parks, schools, places of worship, cemeteries, wildlife management areas, or nature preserve lands within 1,000 feet of the Project area. No tree clearing is anticipated for the Project. Additionally, no significant environmental or cultural resources are expected to be impacted as a result of this Project.

B(10)(b) Agricultural Land

Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

The Project area does not contain agricultural land. Based on data received from the Stark County Auditor's office on March 20, 2025 there are no agricultural district parcels within the potential disturbance area of the Project.

B(10)(c) Archaeological and Cultural Resources

Provide a description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

A cultural resource survey and report were conducted by the Company's consultant for the Project in August 2023. Correspondence from the State Historic Preservation Office ("SHPO") was received in September 2023, see **Appendix D**. The SHPO stated that the Project will have no adverse effect on any historic properties and that no further additional cultural resource investigations are necessary.

B(10)(d) Local, State, and Federal Agency Correspondence

Ohio Power Company South Canton – West Canton 138 kV Transmission Line Cut-In (Reedurban) Project

25-0093-EL-BLN

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Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

A summary of anticipated permits and authorizations for the Project is provided in the **Table 3**, below. There are no other known local, state, or federal requirements that must be met prior to commencement of the Project.

Table 3 – Anticipated Permits for the South Canton – West Canton 138 kV Transmission Line Cut-In (Reedurban) Project

Permit/Authorization/Coordination	Agency	Date
Storm Water Pollution Prevention Plan	Ohio Environmental Protection Agency	NOI approved on 5/1/2024
	Stark County	Approved on 10/29/2024
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete 9/8/2023, no additional work required
Threatened and Endangered Species	United States Fish and Wildlife Service	Coordination complete 8/25/2023
Threatened and Endangered Species	Ohio Department of Natural Resources	Coordination complete 9/21/2023

B(10)(e) Threatened, Endangered, and Rare Species

Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

In August 2023, coordination letters were submitted to the United State Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review of the Project for potential impacts to state and/or federally protected species. ODNR and USFWS provided responses on September 21, 2023, and August 25, 2023, respectively. Copies of the agencies' responses are presented in **Appendix C**.

Table 3, in **Appendix E** lists the federal and state threatened or endangered species in the Project area.

Based on the nature of the proposed Project activities and habitat characteristics of the surrounding vicinity, construction impacts to protected species are not anticipated.

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B(10)(f) Areas of Ecological Concern

Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The Company's consultant conducted a wetland and stream delineation survey in the Project study area in December 2022 and August 2023 and prepared an Ecological Survey Report, which is provided in **Appendix E**. No wetlands or streams were identified within the Project Area. The Project construction activities are not expected to result in discharge of fill in any wetlands or streams.

Based on a review of the Protected Areas Database of the United States as well as the Conservation Easement Database, there are no state or national parks, forests, wildlife areas or mapped conservation easements in the vicinity of the Project.

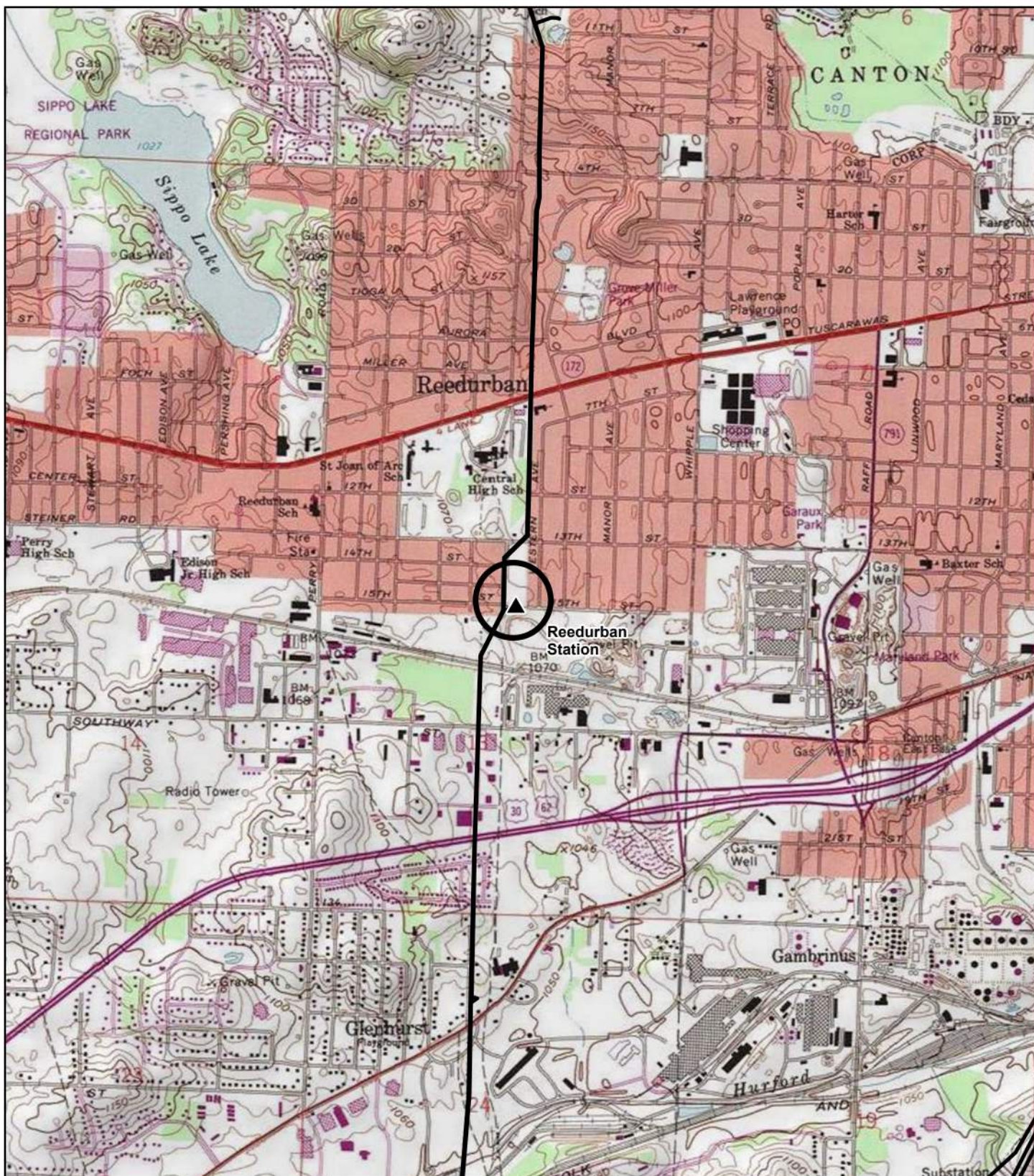
The FEMA Flood Insurance Rate Map ("FIRM") was reviewed to identify any floodplains/flood hazard areas that have been mapped within the Project Area (specifically, map number 39151C0216E). Based on this mapping, no FEMA floodplains are located within the Project area.

B(10)(g) Unusual Conditions

Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of the Company's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

Appendix A Project Figures



- ▲ Existing Substation
- Existing 138 kV Transmission Line
- Project Area

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles
(Canton West)

Coordinate System
and Datum
NAD 1983 State Plane
Ohio North



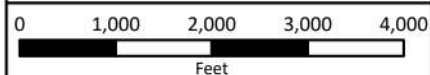
February 03, 2025

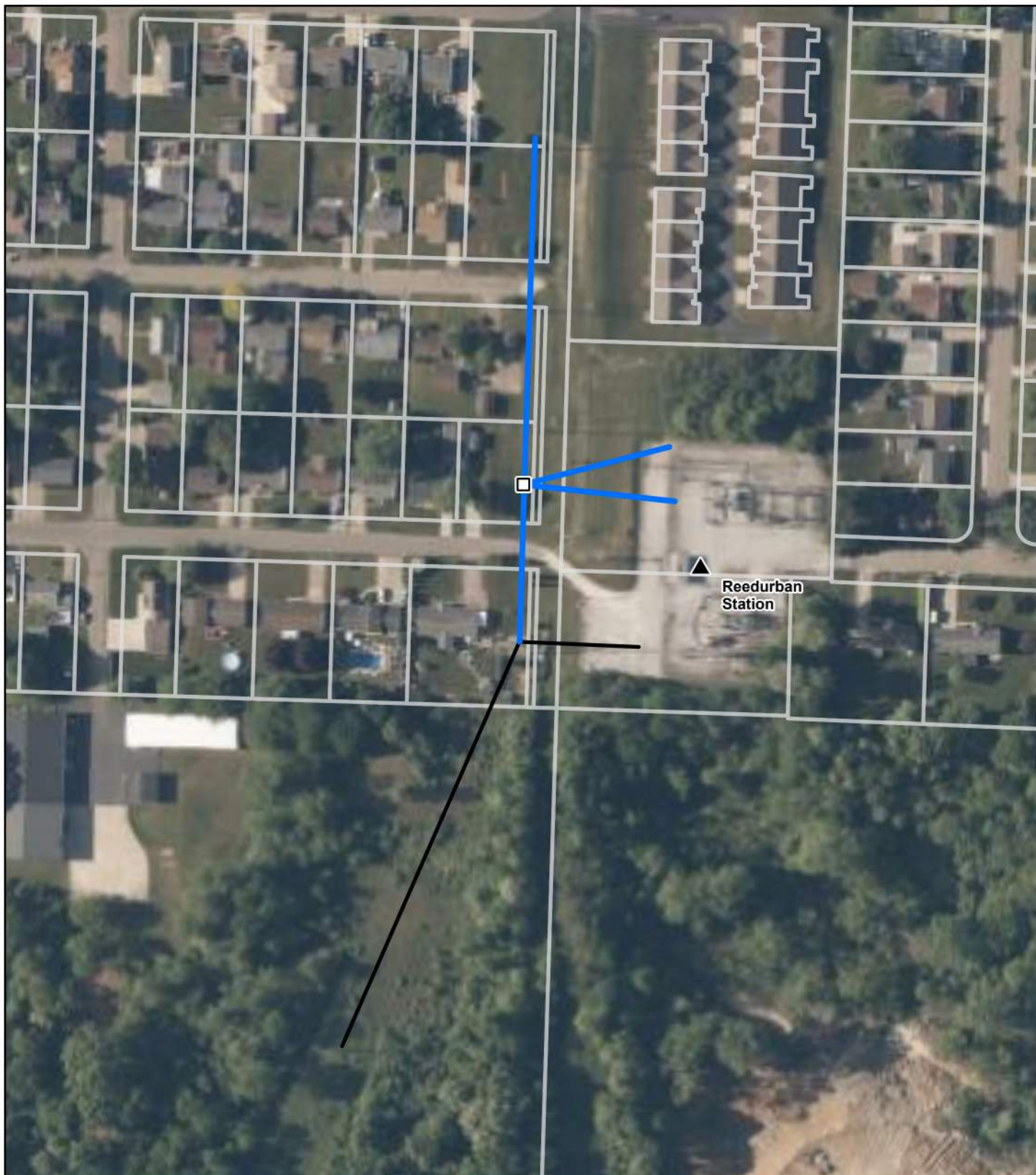


FIGURE 1
TOPOGRAPHIC OVERVIEW



South Canton - West Canton
138 kV Transmission Line Cut-In
(Reedurban) Project





- ▲ Existing Substation
- Proposed Structure
- Proposed Centerline
- Existing 138 kV Transmission Line
- Parcel Boundary

Data Sources: AEP, HIFLD,
NAIP Imagery, 2023

Coordinate System
and Datum
NAD 1983 State Plane
Ohio North



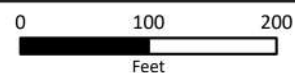
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**FIGURE 2
AERIAL MAP**



South Canton - West Canton
138 kV Transmission Line Cut-In
(Reedurban) Project



Appendix B PJM Solution and Long Term Forecast Report



Need Number: AEP-2021-OH052

Process Stage: Submission of Supplemental Project for inclusion in the Local Plan 1/11/2023

Previously Presented:

Solution Meeting 09/16/2022

Need Meeting 10/15/2021

Project Driver: Equipment Material/Condition/Performance/Risk; Operational Flexibility & Efficiency

Specific Assumption Reference: AEP Guidelines for Transmission Owner Identified Needs (AEP Assumptions Slides 13-14)

Problem Statement:

Reedurban Station:

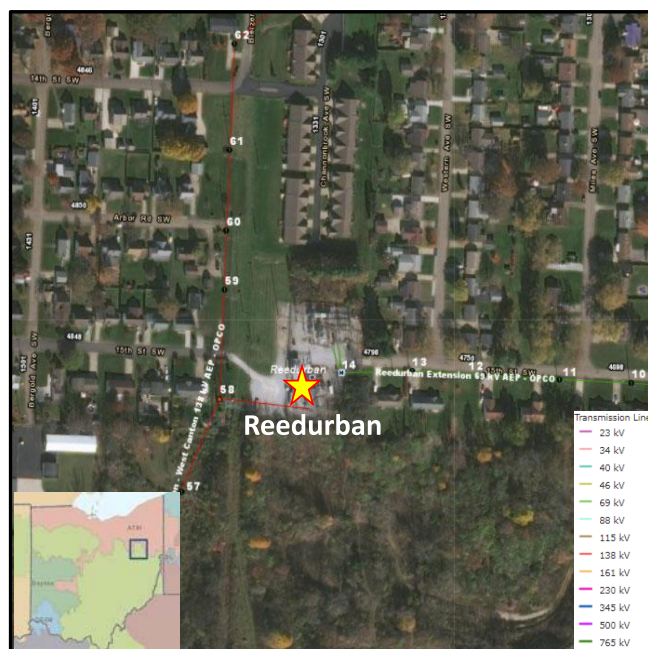
Circuit Breaker: R (69 kV)

- Breaker Age: 1979
- Fault Operations: 10
- This breaker is oil filled without oil containment; oil filled breakers have much more maintenance required due to oil handling that their modern, SF6 counterparts do not require.
- This model family has experienced major malfunctions associated with their OA-3 hydraulic mechanism, which includes low-pressure readings, hydraulic leaks, pump lockouts, and failure to shut off. These mechanism malfunctions have led to several failures to close and other types of misoperations across the AEP fleet.
- The manufacturer provides no support for this family of circuit breakers and spare parts are not available.

Relays: 8 of the 25 relays (21% of all station relays) are in need of replacement. All 8 of these are of the electromechanical type which have significant limitations with regards to spare part availability and fault data collection and retention. The 69kV circuit to Gambrinus used an obsolete pilot wire communications channel.

The control house has a number of concerns: poor ventilation, rusting roof, lead-based paint, and physical security issues. Portions of the perimeter are not built to current standards. All station cables are direct-buried without a cable trench, leading to increased probability of failure. The station service is an obsolete design (delta configuration, with corner ground, which is a safety concern).

AEP Transmission Zone M-3 Process Canton, Ohio





Need Number: AEP-2021-OH052

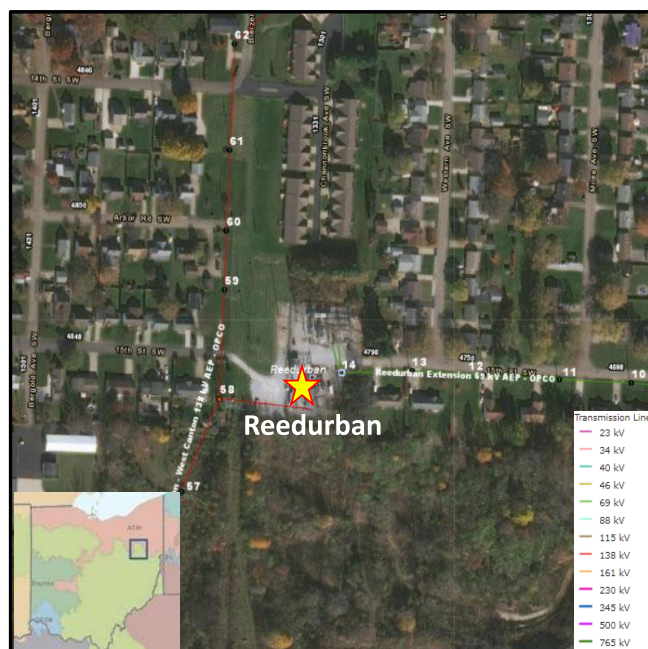
Process Stage: Submission of Supplemental Project for inclusion in the Local Plan 1/11/2023

Problem Statement continued:

Operational Flexibility & Efficiency

The Miles Avenue-Reedurban-South Canton 138kV circuit is a 3-terminal line, due to the 138-69kV transformer source at Reedurban, and the lack of 138kV line breakers at Reedurban (contains motor-operated switches today, requiring remote-end breaker operation). Three-terminal lines are more difficult to reliably protect and are a risk for overtripping and misoperations.

AEP Transmission Zone M-3 Process Canton, Ohio





Need Number: AEP-2021-OH041 and AEP-2021-OH052

Process Stage: Submission of Supplemental Project for inclusion in the Local Plan 1/11/2023

Solution:

Rebuild Gambrinus station as Nolan station approximately 0.2 miles away as a 4-breaker 69kV ring bus. **Estimated Cost: \$7.07 million (s2822.1)**

Retire Gambrinus station and remove all equipment. **Estimated Cost: \$1.04 million (s2822.2)**

Extend the Gambrinus-Reedurban and Gambrinus-Torrey 69kV transmission lines 0.2 mile northward, to connect to Nolan station. **Estimated Cost: \$1.36 million (s2822.3)**

From Nolan station, construct a span of 69kV transmission line and a structure, for each of the two feeds to the customer. This will connect to the customer's 69kV loop. **Estimated Cost: \$0.67 million (s2822.4)**

At the 69kV remote-end of Torrey, upgrade line relays to coordinate with Nolan station. **Estimated Cost: \$0.47 million (s2822.5)**

At the 69kV remote-end of Reedurban, upgrade line relays to coordinate with Nolan and also replace the 69kV oil-filled breaker "R". Convert the 69kV pilot wire system to fiber. Eliminate the 138kV 3-terminal configuration by installing 2- 138kV breakers on the incoming 138kV circuits. **Estimated Cost: \$3.61 million (s2822.6)**

At Reedurban station, reconfigure the South Canton-Reedurban-Miles Avenue 138kV transmission line going into the station, to connect to the new breakers and bus. **Estimated Cost: \$0.66 million (s2822.7)**

At Reedurban station, replace and relocate a structure on the Nolan 69kV transmission line, to accommodate the station improvements and distribution scope. **Estimated Cost: \$0.33 million (s2822.8)**

Total Estimated Transmission Cost: \$15.21 million

Projected In-Service: 12/1/2025

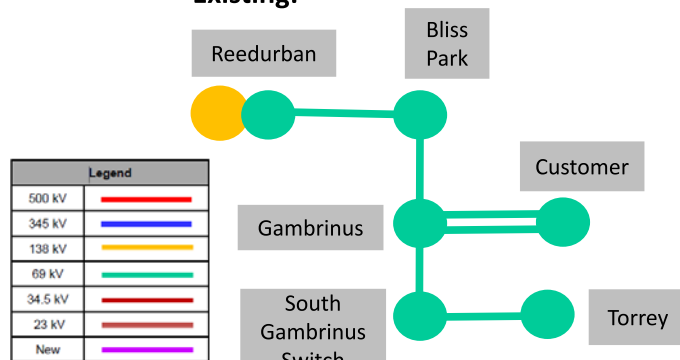
Project Status: Scoping

Supplemental Project ID: s2822.1-.8

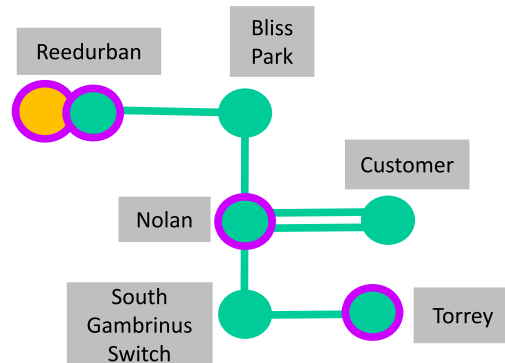
Model: 2026 PJM RTEP

AEP Transmission Zone M-3 Process Gambrinus & Reedurban Station Upgrades

Existing:



Proposed:



Appendix C Form Easement

Line Name: South Canton - West Canton

Line No.: TLN160:00182 **Easement No.:** 28A

EASEMENT AND RIGHT OF WAY

On this ____ day of _____, 2025, in consideration of Ten and NO/100 Dollars (\$10.00), and other valuable consideration, the receipt and sufficiency of which is hereby acknowledged, and the covenants hereinafter set forth, **The East Ohio Gas Company d/b/a Dominion Energy Ohio**, whose address is 1201 East 55th Street, Cleveland, Ohio 44646, ("Grantor"), whether one or more persons, hereby grants, sells, conveys, and warrants to **Ohio Power Company**, a(n) Ohio corporation, a unit of American Electric Power, whose principal business address is 1 Riverside Plaza, Columbus, Ohio 43215, ("AEP") and its successors, assigns, lessees and tenants a permanent easement and right of way ("Easement"), for electric transmission, distribution, and communication lines and appurtenant equipment and fixtures, being, in, on, over, under, through and across the following described lands of the Grantor, known as being part of the Northwest Quarter of Section 13, Perry Township, Stark County, State of Ohio.

Grantor claims title by Warranty Deed, Volume 1810, Page 214, recorded on 05/06/1949; in the Stark County Recorder's Office.

Auditor/Key/Tax Number: 4316239

The Easement Area is more fully described and depicted on Exhibit "A", a copy of which is attached hereto and made a part hereof ("Easement Area").

GRANTOR FURTHER GRANTS AEP THE FOLLOWING RIGHTS:

The right, now or in the future, to construct, reconstruct, operate, maintain, alter, improve, extend, inspect and patrol (by ground or air), protect, repair, remove, replace, upgrade and relocate within the Easement Area, poles, towers, and structures, made of wood, metal, concrete or other materials, and crossarms, guys, anchors, grounding systems, and all other appurtenant equipment and fixtures, and to string conductors, wires and cables; together with the right to add to said facilities from time to time, and the right to do anything necessary, useful or convenient for the enjoyment of the Easement herein granted.

The right, in AEP's discretion, now or in the future, to cut down, trim, remove, and otherwise control, using herbicides or tree growth regulators or other means, any and all trees, overhanging

branches, vegetation or brush situated within the Easement Area. AEP shall also have the right to cut down, trim or remove trees situated on lands of Grantor which adjoin the Easement Area when in the opinion of AEP those trees may endanger the safety of, or interfere with the construction, operation or maintenance of AEP's facilities or ingress or egress to, from or along the Easement Area.

The right of unobstructed ingress and egress, at any and all times, over, across and along and upon the Easement Area, and across the adjoining lands of Grantor as may be necessary for access to and from the Easement Area for the above referenced purposes.

THIS GRANT IS SUBJECT TO THE FOLLOWING CONDITIONS:

The Grantor reserves the right to cultivate annual crops, pasture, construct fences (provided gates are installed that adequately provide AEP the access rights conveyed herein) and roads or otherwise use the lands encumbered by this Easement in any way not inconsistent with the rights herein granted. In no event, however, shall Grantor, its heirs, successors, and assigns plant or cultivate any trees or place, construct, install, erect or permit any temporary or permanent building, structure, improvement or obstruction including but not limited to, storage tanks, billboards, signs, sheds, dumpsters, light poles, water impoundments, above ground irrigation systems, swimming pools or wells, or permit any alteration of the ground elevation, over, or within the Easement Area. AEP may, at Grantor's cost, remove any structure or obstruction if placed within the Easement Area, and may re-grade any alterations of the ground elevation within the Easement Area.

AEP agrees to repair or pay the Grantor for actual damages sustained by Grantor to crops, fences, gates, irrigation and drainage systems, drives, or lawns that are permitted herein, when such damages arise out of AEP's exercise of the rights herein granted.

The failure of AEP to exercise any of the rights granted herein, or the removal of any facilities from the Easement, shall not be deemed to constitute an abandonment or waiver of the rights granted herein.

This instrument contains the complete agreement, expressed or implied between the parties herein and shall inure to the benefit of and be binding on their respective successors, assigns, heirs, executors, administrators, lessees, tenants, and licensees.

This Easement may be executed in counterparts, each of which shall be deemed an original, but all of which, taken together, shall constitute one and the same instrument.

Any remaining space on this page left intentionally blank. See next page for signatures.

IN WITNESS WHEREOF, the Grantor has executed this Easement effective the day, month and year first above written.

GRANTOR

The East Ohio Gas Company, d/b/a Dominion Energy Ohio

By: _____
Title: _____

State of Ohio §
 §
County of Stark §

This instrument was acknowledged before me on the _____ day of _____, 2025, by _____, _____ of The East Ohio Gas Company, d/b/a Dominion Energy Ohio , a(n) Ohio Corporation, on behalf of said corporation.

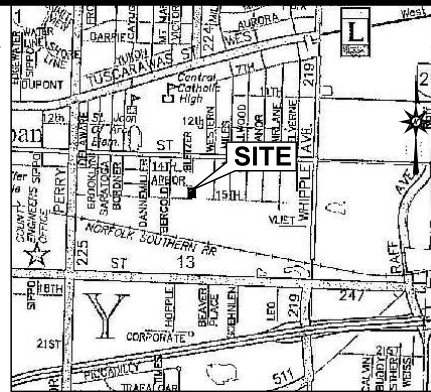
Notary Public
Print Name: _____
My Commission Expires: _____

This instrument prepared by Marland L. Turner, Senior Counsel - Real Estate, American Electric Power Service Corporation, 1 Riverside Plaza, Columbus, OH 43215 for and on behalf of Ohio Power Company, a unit of American Electric Power.

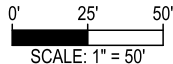
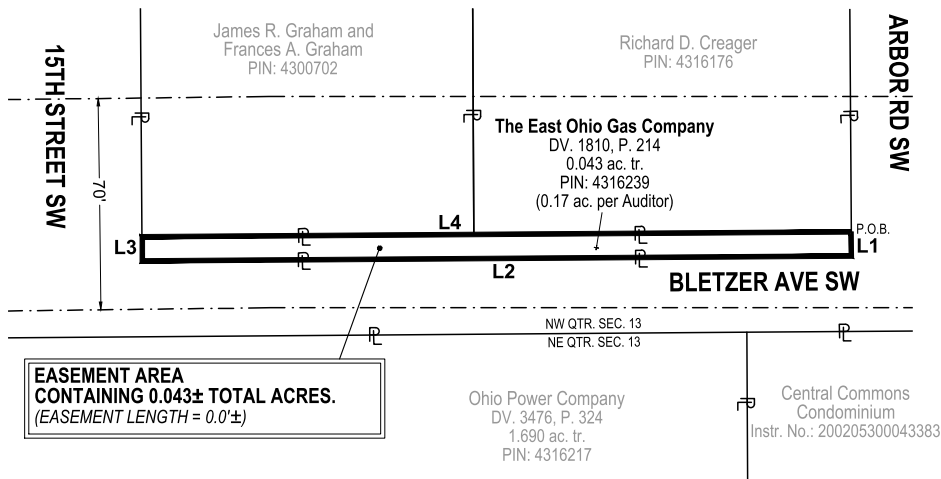
When recorded return to: American Electric Power - Transmission Right of Way, 8600 Smiths Mill Road, New Albany, OH 43054.

EXHIBIT "A"

LINE TABLE		
LINE	BEARING	DISTANCE
L1	S 88°11'58" E	8.00'
L2	S 01°45'19" W	235.00'
L3	N 88°11'58" W	8.00'
L4	N 01°45'19" E	235.00'



Vicinity Map (NTS)



NOTES

-This drawing is for easement purposes only and is not intended to represent a complete survey. -Road right-of-way widths per county engineer or state department unless otherwise noted. -Land ownership information is provided by the title agency and no additional verification has been performed by survey company. -Bearings shown hereon are oriented to the State Plane Coordinate System (NAD 83).

LEGEND

	Easement Area
	Right-of-Way Line
	Property Line
	P.O.B. Point of Beginning

BAIR, GOODIE AND ASSOCIATES, INC.
153 North Broadway, New Philadelphia, Ohio
Email: ktoukonen@bairgoodie.com
Telephone: 330.343.3499 | Fax: 330.343.9505

Line Name: South Canton - West Canton
Line Number: TLN160:00182
Easement Number: 28A

Revised: 10.25.2023 (BE)

File: AEP-WCA110

OHIO POWER COMPANY

EASEMENT ACROSS THE LANDS OF
THE EAST OHIO GAS COMPANY
CONTAINING 0.043± ACRES

Situated in the State of Ohio, County of Stark, and Township of Perry. Located in the Northwest Quarter of Section 13, T-10, R-9.

Scale: 1" = 100' | Date: 10.17.2023 | BPID: P21558022 | Sheet: 1 of 1



Appendix D Agency Correspondence



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6661
Fax: (614) 267-4764

September 21, 2023

Kim Catano
Stantec Consulting Services Inc.
1500 Lake Shore Drive, Suite 100
Columbus, Ohio 43204

Re: 23-0973; AEP South Canton - West Canton 138kV Transmission Line

Project: The proposed project involves the modification of the South Canton-West Canton 138kV double circuit line near Structure 58 to account for station work at Reedurban.

Location: The proposed project is located in Perry Township, Stark County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state, or federal agency nor relieve the applicant of the obligation to comply with any local, state, or federal laws or regulations.

Natural Heritage Database: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that Best Management Practices be utilized to minimize erosion and sedimentation.

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the

leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "[OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING](#)". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the long-solid (*Fusconaia maculata maculata*), a state endangered mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

The project is within the range of the Iowa darter (*Etheostoma exile*), a state endangered fish. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonius*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

ODNR appreciates the opportunity to provide these comments. Please contact Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator



In reply, refer to
2023-STa-58826

September 8, 2023

Ryan Weller
Weller & Associates, Inc.
1395 W. Fifth Ave.
Columbus, OH 43212
rweller@wellercrm.com

RE: South Canton-West Canton 138kV Transmission Line Modification Project, Perry Township, Stark County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received August 17, 2023 regarding the proposed South Canton-West Canton 138kV Transmission Line Modification Project, Perry Township, Stark County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-4 & 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Cultural Resource Management Investigations for the 243.8 m (800 ft) South Canton-West Canton 138kV Transmission Line Modification Project in Perry Township, Stark County, Ohio* by Ryan J. Weller and Scott McIntosh (Weller & Associates, Inc. 2023).

A literature review, visual inspection, surface collection, shovel probe, and shovel test unit excavation was completed as part of the investigations. No previously identified archaeological sites are located in the project area and no new archaeological sites were identified during survey. Our office agrees no additional archaeological survey is needed.

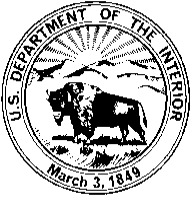
A literature review and field survey were conducted as part of the investigations. A total of sixty-one (61) architectural resources fifty years of age or older were identified in the Area of Potential Effects (APE). It is Weller's recommendation that none of the architectural resources are eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with Weller's recommendations of eligibility.

Based on the information provided, we agree the project as proposed will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorrocks@ohiohistory.org or Joy Williams at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1099473



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994



August 25, 2023

Project Code: 2023-0112252

Dear Kim Catano:

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened, endangered, and proposed species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The bat faces extinction due to the impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. During spring, summer, and fall, this species roosts primarily among leaf clusters of live or recently dead trees, emerging at dusk to hunt for insects over waterways and forest edges. While white-nose syndrome is by far the most serious threat to the tricolored bat, other threats now have an increased significance due to the dramatic decline in the species' population. These threats include disturbance to bats in roosting, foraging, commuting, and over-wintering habitats. Mortality due to collision with wind turbines, especially during migration, has also been documented across their range. Conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats and northern long-eared bats. If Indiana bats and northern long-eared bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

A handwritten signature in blue ink that reads "Angela L. Boyer". The signature is fluid and cursive, with the first name "Angela" and last name "Boyer" clearly legible.

Angela Boyer
Acting Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Eileen Wyza, ODNR-DOW

Appendix E Ecological Survey Report



**South Canton – West Canton
138kV Transmission Line Project,
Stark County, Ohio**

Ecological Survey Report

Prepared for:

AEP Ohio Transmission Company, Inc.
8600 Smiths Mill Road
New Albany, OH 43054

Prepared by:

Stantec Consulting Services Inc.
1500 Lake Shore Drive, Suite 100
Columbus, OH 43204


October 6, 2023

Sign-off Sheet

The conclusions in the Report titled South Canton – West Canton 138kV Transmission Line Project Ecological Survey Report are Stantec Consulting Services Inc. ("Stantec")'s professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Stantec has assumed all information received from AEP Ohio Transmission Company, Inc. (the "Client") and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.


This Report is intended solely for use by the Client in accordance with Stantec's contract with the Client. While the Report may be provided by the Client to applicable authorities having jurisdiction and to other third parties in connection with the project, Stantec disclaims any legal duty based upon warranty, reliance, or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

Prepared by 
(signature)

Samantha Heitzenrater

Reviewed by 
(signature)

Tyler Gillette

Reviewed by 
(signature)

Michael de Villiers

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Introduction
October 6, 2023

1.0 INTRODUCTION

AEP Ohio Transmission Company, Inc. (AEP) is proposing to modify the South Canton – West Canton 138kV (kilovolt) double circuit line near Structure 58 to account for station work at Reedurban (the Project). Structure 58 may need removed and replaced with two poles. This will include a Project area that is 0.15-mile long by 200' wide. The Project is located southwest of the City of Canton in Stark County, Ohio (Figure 1, Appendix B). The proposed Project area was surveyed for wetlands, waterbodies, open water features, upland drainage features, and potential threatened, endangered, and rare species habitat by Stantec Consulting Services Inc. (Stantec) biologists on December 2, 2022, and August 10, 2023 (Figure 2, Appendix B). The approximate locations of features located up to 50 feet outside of the Project area were also recorded during the field surveys, where landowner access was permitted. However, no data forms were collected on features that did not extend into the Project area. These features are shown on the Figure 2 map in Appendix B as “approximate” wetlands, streams (waterways), open waters, and upland drainage features.

2.0 METHODS

2.1 WETLAND DELINEATION

Prior to completing the field surveys, a desktop review of the Project area was conducted using U.S. Geological Survey (USGS) topographic maps, National Wetlands Inventory (NWI) maps, U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey data, and aerial imagery mapping. Stantec completed a wetland delineation study in accordance with the *Corps of Engineers Wetlands Delineation Manual* (USACE Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region* (Version 2.0; USACE 2011). Wetland categories were classified using the Ohio Rapid Assessment Method (ORAM) for Wetlands Version 5.0 (Mack 2001).

2.2 STREAM DELINEATION

Streams that demonstrated a continuously defined channel (bed and bank), ordinary high water mark (OHWM), and the disturbance of terrestrial vegetation were delineated within the Project area, per the protocols outlined in the USACE's Guidance on Ordinary High Water Mark Identification (Regulatory Guidance Letter, No. 05-05; USACE 2005). Delineated streams were classified as ephemeral, intermittent, or perennial per definitions in the Federal Register/Vol. 67, No. 10 (USACE 2002) and determined as potential Waters of the U.S. (WOTUS) in reference to the current guidance per interpretation of WOTUS that is consistent with the pre-2015 regulatory regime (40 CFR 230.3(s)) (USEPA 2022). Functional assessment of streams within the Project area was based on completion of the Ohio Environmental Protection Agency's (OEPA) Headwater

Results

October 6, 2023

Habitat Evaluation Index (HHEI; OEPA 2020) and/or Qualitative Habitat Evaluation Index (QHEI; OEPA 2006). The centerline and/or the OHWM locations of each waterway were identified and surveyed using a handheld sub-meter accuracy GPS unit and mapped with GIS software. Additionally, the locations of upland drainage features (which lacked a continuously defined bed and bank/OHWM) identified within the Project area were also recorded with a sub-meter accuracy GPS unit during the field surveys.

2.3 RARE SPECIES

Prior to conducting the field surveys, Stantec contacted the Ohio Department of Natural Resources (ODNR) and the U.S. Fish and Wildlife Service (USFWS) for information regarding rare, threatened, or endangered species and their habitats of concern within the vicinity of the Project area (Appendix E – Agency Correspondence). To assess potential impacts to rare, threatened, or endangered species, Stantec scientists conducted a pedestrian reconnaissance of the Project area, collected information on existing habitats within the Project area, and assessed the potential for these habitats to be used by these species.

3.0 RESULTS

3.1 TERRESTRIAL HABITAT

Stantec completed field surveys within the Project area on December 2, 2022, and August 10, 2023, for potentially suitable habitats for threatened and endangered species. Figure 3 (Appendix B) shows the land cover, vegetation communities, and any identified rare, threatened, or endangered species habitats observed within the Project area during the habitat assessment surveys. Representative photographs of the vegetation communities/habitats identified within the Project area are included in Appendix D of this report (photo locations are shown on Figure 3 in Appendix B). Information regarding the vegetation communities/habitats identified within the Project area is provided in Table 1.

Table 1. Vegetation Communities and Land Cover Found within the South Canton – West Canton 138kV Transmission Line Project Area, Stark County, Ohio

Vegetation Communities and Land Cover Types within the Project Area	Degree of Human-Related Ecological Disturbance	Unique, Rare, or High Quality?	Approximate Acreage Within Project Area
Maintained Lawn	Moderate to Extreme Disturbance/Ruderal Community (dominated by opportunistic invaders, planted non-native species, and/or native highly tolerant taxa). Dominant species included common dandelion (<i>Taraxacum officinale</i>), red clover (<i>Trifolium pratense</i>), red fescue (<i>Festuca rubra</i>),	No	3.01

SOUTH CANTON – WEST CANTON 138KV TRANSMISSION LINE PROJECT ECOLOGICAL SURVEY REPORT

Results

October 6, 2023

Vegetation Communities and Land Cover Types within the Project Area	Degree of Human-Related Ecological Disturbance	Unique, Rare, or High Quality?	Approximate Acreage Within Project Area
	English plantain (<i>Plantago lanceolata</i>), ground ivy (<i>Glechoma hederacea</i>), hedge bedstraw (<i>Galium mollugo</i>), alsike clover (<i>Trifolium hybridum</i>), and chicory (<i>Cichorium intybus</i>).		
Industrial Land	Extreme Disturbance/Ruderal Community (little to no vegetation is present in these habitats).	No	0.07
Existing Roadway	Extreme Disturbance/Ruderal Community (little to no vegetation is present in these habitats).	No	0.15
TOTAL			3.23

3.2 WETLANDS

Desktop analysis determined that the Project area contains one NWI feature, however, no wetlands were identified within the Project area during the field surveys conducted on December 2, 2022 and August 10, 2023. The NWI feature was in an upland area and is not considered to be a wetland. Two sample points (SP1 and SP2) were collected to document the existing conditions within the Project area. The wetland determination data forms are included in Appendix C, representative photographs of the sample points are included in Appendix D, and the locations of the sample points are depicted on Figure 2, Appendix B.

Table 2. Summary of NWI Disposition within the South Canton – West Canton 138kV Transmission Line Project Area Stark County, Ohio

NWI Code	NWI Description	Figure 2 Page Number	Related Field Inventoried Resource	Comments
PSS1C	Palustrine Scrub-Shrub Wetland, Broad-Leaved Deciduous, Seasonally Flooded	1	SP2	Determined to be an upland area, SP2

3.3 STREAMS

No streams were delineated within the Project area during field surveys completed December 2, 2022, and August 10, 2023. Desktop analysis determined that the Project area does not contain any mapped National Hydrography Data (NHD) features or USGS named streams.

3.4 OPEN WATERS

No open waters (i.e., ponds, lakes) were delineated within the Project area during the field surveys completed on December 2, 2022, and August 10, 2023.

3.5 RARE, THREATENED, OR ENDANGERED SPECIES HABITAT

Table 3. Summary of Potential Federal and Ohio State-Listed Species within the South Canton – West Canton 138kV Transmission Line Project Area Stark County, Ohio

Common/Scientific Names	*State Listed Status	*Federally Listed Status	Typical Habitat	Habitat Observed	Agency Comment** (Appendix E)	Potential Impacts and Avoidance Dates
Indiana bat/ <i>Myotis sodalis</i>	E	E	The Indiana bat is likely distributed over the entire State of Ohio, though not uniformly. This species generally forages in openings and edge habitats within upland and floodplain forest, but they also forage over old fields and pastures (Brack et al. 2010). Natural roost structures include trees (live or dead) with exfoliating bark, and exposure to solar radiation. Other important factors for roost trees include relative location to other trees, a permanent water source and foraging areas. Dead trees are preferred as maternity roosts; however, live trees are often used as secondary roosts depending on microclimate conditions (USFWS 2007, USFWS 2023). Roosts have also occasionally been found to consist of cracks and hollows in trees, utility poles, buildings, and bat boxes. Primarily use caves for hibernacula, although are also known to hibernate in abandoned underground mines (Brack et al. 2010).	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area.	<p>ODNR – This Project lies within the range of the Indiana bat. If trees are present within the Project area and trees must be cut, the ODNR DOW recommends cutting occur between October 1 and March 31 conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH \geq 20 if possible. If trees are present within the Project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. In addition, the DOW recommends a desktop habitat assessment, followed by a field assessment if needed, to determine if there are potential hibernacula present within the Project area.</p> <p>USFWS – The Indiana bat occurs throughout the State of Ohio. If the proposed Project area contains trees \geq 23 inches dbh, the USFWS recommends that trees be saved wherever possible. If no caves or abandoned mines are present and trees \geq 23 inches dbh cannot be avoided, USFWS recommends that removal of any trees \geq 23 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats.</p>	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area. Therefore, this Project is not likely to impact this species.
Northern Long-eared Bat/ <i>Myotis septentrionalis</i>	E	E	The northern long-eared bat is found throughout Ohio. This species generally forages in forested habitat and openings in forested habitat and utilizes cracks, cavities, and loose bark within live and dead trees, as well as buildings as roosting habitat (Brack et al. 2010; USFWS 2023). The species utilizes caves and abandoned mines as winter hibernacula. Various sized caves are used providing they have a constant temperature, high humidity, and little to no air current (Brack et al. 2010).	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area.	<p>ODNR – This Project lies within the range of the northern long-eared bat. If trees are present within the project area and trees must be cut, the ODNR DOW recommends cutting occur between October 1 and March 31 conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH \geq 20 if possible. If trees are present within the Project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. In addition, the DOW recommends a desktop habitat assessment, followed by a field assessment if needed, to determine if there are potential hibernacula present within the Project area.</p> <p>USFWS – The northern long-eared bat occurs throughout the state of Ohio. If the proposed Project area contains trees \geq 23 inches dbh, the USFWS recommends that trees be saved wherever possible. If no caves or abandoned mines are present and trees \geq 23 inches dbh cannot be</p>	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area. Therefore, this Project is not likely to impact this species.

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Common/Scientific Names	*State Listed Status	*Federally Listed Status	Typical Habitat	Habitat Observed	Agency Comment** (Appendix E)	Potential Impacts and Avoidance Dates
Little Brown Bat/ <i>Myotis lucifugus</i>	E	N/A	This bat uses a wide range of habitats and man-made structures for roosting, including buildings and attics. Less frequently, they use hollows of trees. Winter hibernation sites typically consist of caves, tunnels, abandoned mines. Foraging habitat for this species generally occurs over water, along the edges of lakes and stream or in woodlands near waterbodies (NatureServe 2023).	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area.	avoided. USFWS recommends that removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal tree clearing is recommended to avoid adverse effects to the northern long-eared bat. ODNR – This Project lies within the range of the little brown bat. If trees are present within the project area and trees must be cut, the ODNR DOW recommends cutting occur between October 1 and March 31 conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the Project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. In addition, the DOW recommends a desktop habitat assessment, followed by a field assessment if needed, to determine if there are potential hibernacula present within the Project area. USFWS – No comments received.	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area. Therefore, this Project is not likely to impact this species.
Tricolored Bat/ <i>Perimyotis subflavus</i>	E	PE	This bat is associated with forested landscapes, where they forage near trees and along waterways. Maternity and summer roosts usually occur in dead or live tree foliage, or in the south, in clumps of Spanish moss. Maternity colonies may also use tree cavities or man-made structures, such as buildings or bridges. Caves, mines, and rock crevices may be used as night roosts between foraging (NatureServe 2023).	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area.	ODNR – This Project lies within the range of the tricolored bat. If trees are present within the project area and trees must be cut, the ODNR DOW recommends cutting occur between October 1 and March 31 conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the Project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. In addition, the DOW recommends a desktop habitat assessment, followed by a field assessment if needed, to determine if there are potential hibernacula present within the Project area. USFWS – On September 14, 2022, USFWS proposed to list the tricolored bat as endangered under the Endangered Species Act. USFWS stated that conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.	No suitable winter hibernacula or summer roosting and foraging habitat was observed within the Project area. Therefore, this Project is not likely to impact this species.
Long-solid/ <i>Fusconia maculata maculata</i>	E	N/A	This mussel is found in the gravel substrates of shoals and riffles of large rivers, as well as impounded areas (NatureServe 2023).	No suitable habitat was observed in the Project area.	ODNR – The Project is within the range of this species. However, due to the location, and that there is no in-water work proposed in a perennial stream, this Project is not likely to impact this species. USFWS – No comments received.	No suitable habitat was observed within the Project area. Therefore, this Project is not likely to impact this species.

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Common/Scientific Names	*State Listed Status	*Federally Listed Status	Typical Habitat	Habitat Observed	Agency Comment** (Appendix E)	Potential Impacts and Avoidance Dates
Iowa darter / <i>Etheostoma exile</i>	E	N/A	This species is found in clear sluggish vegetated headwaters, creeks, and in small to medium rivers; weedy portions of glacial lakes, marshes, ponds; over substrates of sand, peat, and/or organic debris (NatureServe 2023).	No suitable habitat was observed in the Project area.	ODNR – The Project is within the range of this species. However, due to the location, and that there is no in-water work proposed in a perennial stream, this Project is not likely to impact this species. USFWS – No comments received.	No suitable habitat was observed within the Project area. Therefore, this Project is not likely to impact this species.
Spotted Turtle / <i>Clemmys guttata</i>	T	N/A	This species inhabits mostly unpolluted, shallow bodies of water with a soft bottom and aquatic vegetation, such as small marshes, marshy pastures, bogs, fens, woodland streams, swamps, small ponds, vernal pools, and lake margins (NatureServe, 2023).	No suitable habitat was observed in the Project area.	ODNR – The Project is within the range of this species. However, due to the location, the type of habitat within the Project area, and the type of work proposed, this Project is not likely to impact this species. USFWS – No comments received.	No suitable habitat was observed within the Project area. Therefore, this Project is not likely to impact this species.
Northern harrier / <i>Circus hudsonis</i>	E	N/A	This species is typically a resident of grasslands, wetlands, and upland habitats. As these habitats were converted to cultivated crops, harriers started to occupy pasture, hayfield and cultivated fields. In Ohio they prefer wet prairies, damp meadows, and the grassy margins of large wetlands. (Smith, K. G, 2020).	No nesting habitat was observed within the Project area.	ODNR – The Project is within the range of this species. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this Project is not likely to impact this species. USFWS – No comments received.	No nesting habitat was observed within the Project area. Due to no nesting habitat being present and the mobility of this species during their use of wintering grounds, the Project is not likely to impact this species.

*Status key, E=Endangered; T=Threatened; N/A=Not Applicable

**The information is based on the literature review response information from ODNR and USFWS and is study area/project specific.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Stantec conducted a wetland and waterbodies delineation and a preliminary habitat assessment for threatened and endangered species within the Project area on December 2, 2022, and August 10, 2023. During the field surveys, no wetlands, streams, or open water features were observed within the Project area.

The information provided by Stantec regarding wetland and stream boundaries is based on an analysis of the wetland and upland conditions present within the Project area at the time of the field work. The delineations were performed by experienced and qualified professionals using regulatory agency-accepted practices and sound professional judgment.

An ODNR Ohio Natural Heritage Program data request and environmental review request letter was sent to the ODNR Office of Real Estate on August 16, 2023. The ODNR Office of Real Estate response letter dated September 21, 2023, stated that the entire state of Ohio is within the range of the Indiana bat, northern long-eared bat, little brown bat, and tricolored bat. If trees are present within the Project area, and trees must be cut, the Division of Wildlife (DOW) recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with diameter at breast height (dbh) ≥ 20 inches if possible. The DOW also recommends a desktop habitat assessment, followed by a field assessment if needed, is conducted to determine if there are potential hibernaculum(a) present within 0.25 mile of the Project area. Stantec completed a desktop habitat assessment in accordance with the 2023 Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines (USFWS 2023) utilizing available ODNR websites, including data on known abandoned or active mines (ODNR 2023a) and locations of known or suspect karst geology (ODNR 2023b). The desktop assessment did not identify any karst regions or abandoned or active mines within 0.25 mile of the Project area (Figure 4; Appendix B). In addition, no potentially suitable winter hibernacula, suitable summer foraging, or roosting habitat were observed within the Project area during field surveys. Therefore, the Project is not likely to impact this species.

According to the ODNR response letter, the Project is within the range of the state endangered long-solid and the state endangered Iowa darter. However, the DOW stated that due to the location, and that no in-water work is proposed in a perennial stream, the Project is not likely to impact these species. In addition, no suitable habitat, perennial streams, were identified within the Project area. Therefore, the Project is not likely to impact this species.

According to the ODNR response letter, the Project is within the range of the state threatened spotted turtle. However, the DOW stated that due to the location, the type of habitat within the Project area, and the type of work proposed, this Project is not likely to impact this species. In addition, no suitable habitat; marshes, bogs, and wet prairies, were identified within the Project area. Therefore, the Project is not likely to impact this species.

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According to the ODNR response letter, the Project is within the range of the state endangered northern harrier. No nesting habitat was observed within the Project area. Therefore, due to no nesting habitat being present and the mobility of this species during their use of wintering grounds, the Project is not likely to impact this species.

A technical assistance request letter was submitted to the USFWS on August 21, 2023. The USFWS response letter dated August 25, 2023, recommends that the proposed Project avoid and minimize impacts to all wetland habitats to the maximum extent possible and natural buffers around streams and wetlands should be preserved to enhance beneficial functions.

According to the USFWS response letter, the federally endangered northern long-eared bat, federally endangered Indiana bat, and the federally proposed endangered tricolored bat occur throughout the state of Ohio. Therefore, USFWS recommends that trees ≥ 3 inches dbh be saved wherever possible and any tree removal that is unavoidable should only occur between October 1 and March 31 to avoid adverse effects to these species. If implementation of this seasonal tree cutting recommendations is not possible, a summer presence/absence survey may be conducted for Indiana bats and northern long-eared bats during the Ohio summer mist net survey window, June 1 through August 15. The Project area does not contain potentially suitable foraging or roosting habitat. Therefore, the Project is not likely to impact these species.

The USFWS also stated that due to the Project type, size, and location, they do not anticipate adverse effects to any other federally endangered, threatened, proposed or candidate species due to the Project type, size, and location (Appendix E).

References

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5.0 REFERENCES

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Impact Table
October 6, 2023

APPENDIX A **IMPACT TABLE**

Table 2. Summary of NWI Disposition within the South Canton – West Canton 138kV Transmission Line Project Area Stark County, Ohio

NWI Code	NWI Description	Figure 2 Page Number	Related Field Inventoried Resource	Comments
PSS1C	Palustrine Scrub-Shrub Wetland, Broad-Leaved Deciduous, Seasonally Flooded	1	SP2	Determined to be an upland area, SP2

Figures
October 6, 2023

APPENDIX B FIGURES

B.1 PROJECT LOCATION MAP

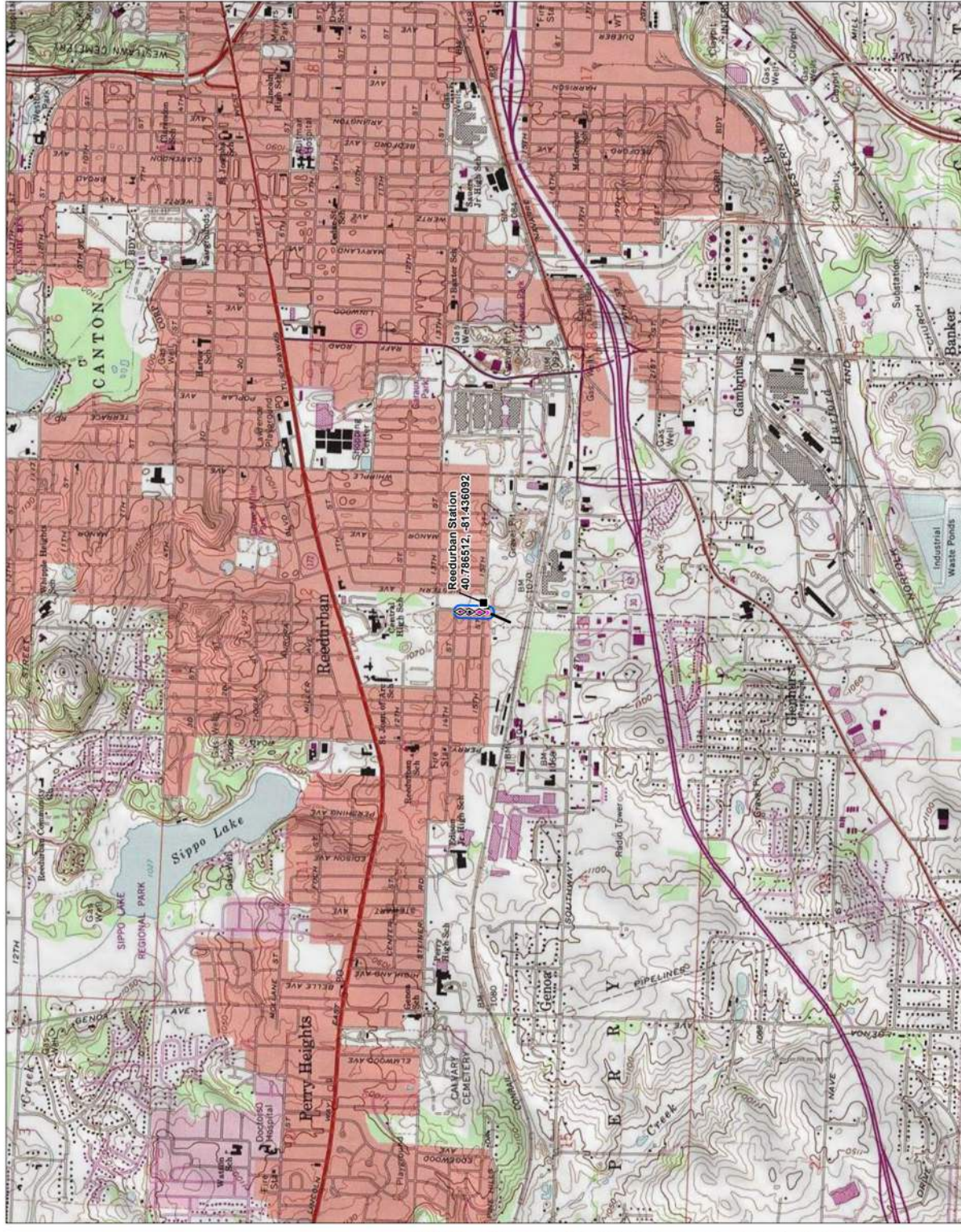


Figure No. 1

Project Location Map

Client/Project
AEP Ohio Transmission Company, Inc.
South Canton - West Canton 138kV Transmission Line Project
Project Location
South Canton, Ohio
183709162
Prepared by J.D. on 2023-07-31
Reviewed by J.D. on 2023-08-01
ES by MDV on 2023-08-12



Notes:
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Source: Stantec AEP USGS, MDOS
3. Background: USGS 7.5 Topographic, Contour Interval (100)



Figures

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B.2 WETLAND AND WATERBODY DELINEATION MAP



Figure No.

Wetland and Waterbody Delineation Map

<p>Client/Project AEP Ohio Transmission Company, Inc. South Canton - West Canton 138kV Transmission Line Project</p>	<p>Project Location Shank County, Ohio</p>
---	---



- Legend**
- AEP Substation
 - Existing Structure
 - ◇ Proposed Structure
 - Existing Transmission Line
 - - - Proposed Transmission Line
 - ▭ Project Area
 - Photo Location
 - Wetland Determination Sample Point
 - National Wetlands Inventory Feature

*No features within data frame



Notes

1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet.
2. Data Sources: Stantec, AEP, USFWS, FEMA, NADS, OGRIP
3. Background: NAD 2011



Figures
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B.3 HABITAT ASSESSMENT MAP

Figure No.

3

Habitat Assessment Map

Client/Project
AEP Ohio Transmission Company, Inc.
South Canton - West Canton 138kV Transmission
Line Project
Project Location
Stark County, Ohio
Prepared by ST on 2/23/2023-08-22
Reviewed by ST on 2/23/2023-08-22
ES by MDV on 2/23/2023-08-12



- Legend
- AEP Substation
 - Existing Structure
 - ◇ Proposed Structure
 - Existing Transmission Line
 - - - Proposed Transmission Line
 - Project Area
 - Photo Location
 - ▨ Habitat Area
 - ▨ Maintained Lawn
 - ▨ Industrial Land
 - ▨ Existing Roadway



Notes:
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Source: Stantec AEP (USFWS, NAD8, OGRS)
3. Background: NIP 2011



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Figures
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B.4 HIBERNACULA DESKTOP STUDY MAP

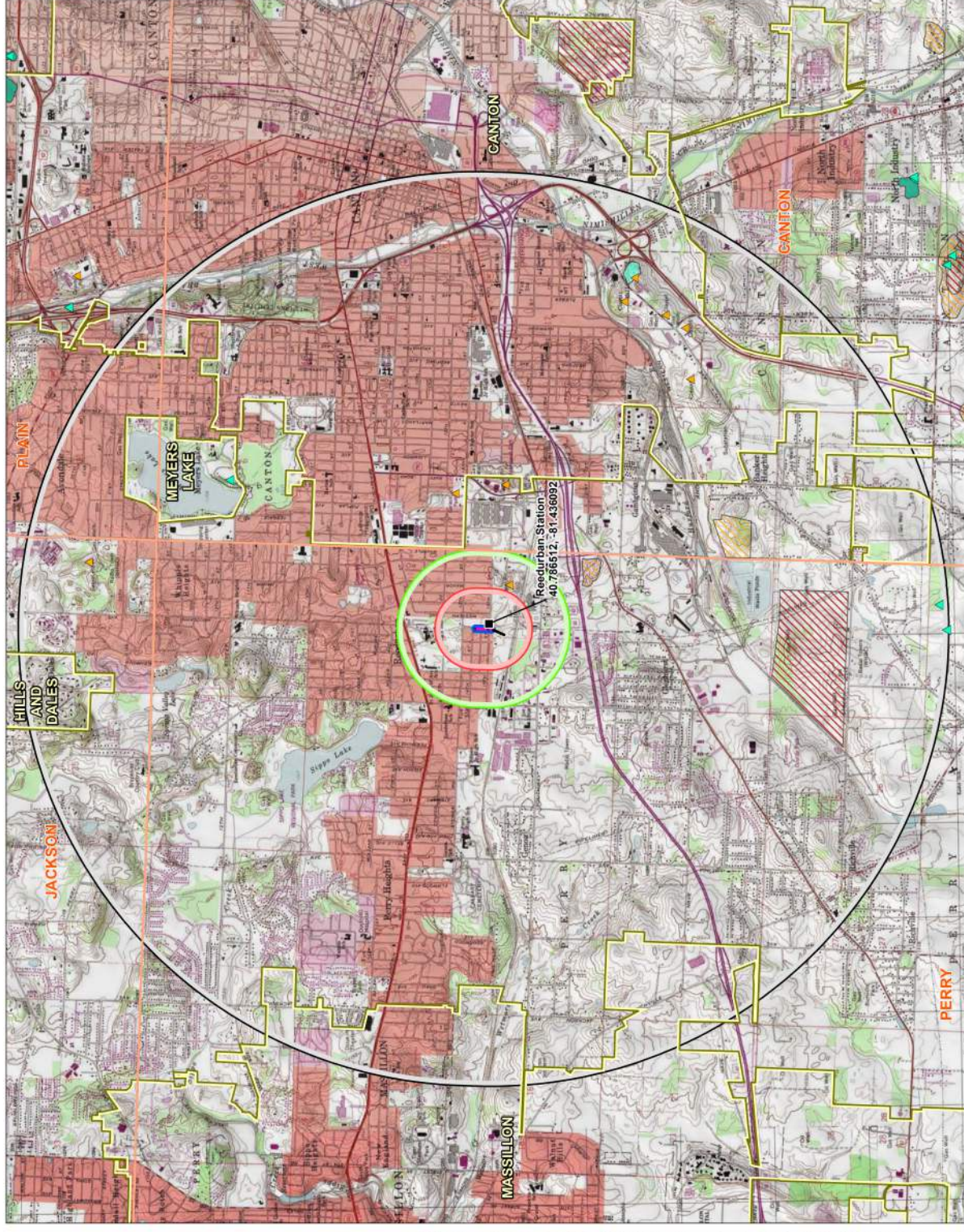
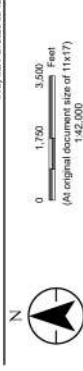


Figure No. 4

Bat Hibernacula Desktop Study Map

Client/Project
AEP Ohio Transmission Company, Inc.
South Canton - West Canton 138kV Transmission
Line Project
Project Location
South Canton, OH
Prepared by ST on 2/23/2023-08-08
Reviewed by ST on 2/23/2023-08-08
ES by MCV on 2/23/2023-08-12



- Legend**
- AEP Substation
 - Proposed Transmission Line
 - Existing Transmission Line
 - Project Area
 - 0.25-Mile Project Area Buffer
 - 0.5-Mile Project Area Buffer
 - 3-Mile Project Area Buffer
 - Township Boundary
 - Municipal Boundary
 - Karst Feature*
 - Area of Karst Geology*
 - ▲ Abandoned Underground Mine
 - ▲ Inactive Mine*
 - ▲ Active Surface Mine*
 - ▲ Active Underground Mine
 - ▲ Abandoned Surface Mine Area
 - ▲ Abandoned Underground Mine Area
 - ▲ Inactive Surface Mine Area
 - ▲ Inactive Underground Mine Area
 - ▲ Surface Mine Area (Unknown Status)*

*No features within data frame



Notes:
1. Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet
2. Data Source: Stantec AEP USGS, DNR, NAD83, Census East, OH (1983), Census West, OH (1986), Baker, OH (1976), Waynesburg, OH (1976), Massillon, OH (1976), and Newark, OH (1972)



Field Collected Data Forms
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APPENDIX C FIELD COLLECTED DATA FORMS

C.1 WETLAND DETERMINATION FORMS

Project/Site: South Canton – West Canton 138kV Line City/County: Stark County Sampling Date: 08/10/2023
 Applicant/Owner: AEP Ohio Transmission Company, Inc. State: Ohio Sampling Point: SP1
 Investigator(s): Michelle Kearns Section, Township, Range: T010N, R009W, S13
 Landform (hillside, terrace, etc.): Terrace Local relief (concave, convex, none): Concave Slope %: 3
 Subregion (LRR or MLRA): LRR R, MLRA 139 Lat: 40.787347 Long: -81.43665 Datum: WGS84
 Soil Map Unit Name: Chili-Urban land complex, undulating NWI classification: N/A
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No (If no, explain in Remarks.)
 Are Vegetation N, Soil N, or Hydrology N significantly disturbed? Are "Normal Circumstances" present? Yes X No
 Are Vegetation N, Soil N, or Hydrology N naturally problematic? (If needed, explain any answers in Remarks.)

Hydrophytic Vegetation Present? Yes _____ No <u>X</u> Hydric Soil Present? Yes _____ No <u>X</u> Wetland Hydrology Present? Yes _____ No <u>X</u>	Is the Sampled Area within a Wetland? Yes _____ No <u>X</u> If yes, optional Wetland Site ID: _____
Remarks: (Explain alternative procedures here or in a separate report.)	

Wetland Hydrology Indicators: <u>Primary Indicators (minimum of one is required; check all that apply)</u> <input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Aquatic Fauna (B13) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Marl Deposits (B15) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)			<u>Secondary Indicators (minimum of two required)</u> <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input type="checkbox"/> FAC-Neutral Test (D5)		
Field Observations: Surface Water Present Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <input type="text"/> Water Table Present Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <input type="text"/> Saturation Present Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <input type="text"/> (includes capillary fringe)			Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:					
Remarks:					

VEGETATION – Use scientific names of plants.

Sampling Point: SP1

Tree Stratum (Plot size: 30 ft)	Absolute % Cover	Dominant Species	Indicator Status	
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
5. _____	_____	_____	_____	
6. _____	_____	_____	_____	
7. _____	_____	_____	_____	
	0	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15 ft)				
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
5. _____	_____	_____	_____	
6. _____	_____	_____	_____	
7. _____	_____	_____	_____	
	0	= Total Cover		
Herb Stratum (Plot size: 5 ft)				
1. Festuca rubra	90	Yes	FACU	
2. Taraxacum officinale	5	No	FACU	
3. Plantago lanceolata	5	No	FACU	
4. _____	_____	_____	_____	
5. _____	_____	_____	_____	
6. _____	_____	_____	_____	
7. _____	_____	_____	_____	
8. _____	_____	_____	_____	
9. _____	_____	_____	_____	
10. _____	_____	_____	_____	
11. _____	_____	_____	_____	
12. _____	_____	_____	_____	
	100	= Total Cover		
Woody Vine Stratum (Plot size: 30 ft)				
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
	0	= Total Cover		

Dominance Test worksheet:

 Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

 Total Number of Dominant Species Across All Strata: 1 (B)

 Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species 0	x 1 = 0
FACW species 0	x 2 = 0
FAC species 0	x 3 = 0
FACU species 100	x 4 = 400
UPL species 0	x 5 = 0
Column Totals: 100 (A)	400 (B)
Prevalence Index = B/A = 4	

Hydrophytic Vegetation Indicators:
 - 1 - Rapid Test for Hydrophytic Vegetation
 - 2 - Dominance Test is >50%
 - 3 - Prevalence Index is ≤3.0¹
 - 4 - Morphological Adaptations¹
 (Provide supporting data in Remarks or on a separate sheet)

 Problematic Hydrophytic Vegetation¹ (Explain)

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes _____ No X

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: SP1

[illegible]

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: South Canton - West Canton 138kV Line City/County: Stark County Sampling Date: 12/02/2022
Applicant/Owner: AEP Ohio Transmission Company Inc. State: Ohio Sampling Point: SP2
Investigator(s): T.Gillette and A. Hansen Section, Township, Range: T010N, R009W, S13
Landform (hillside, terrace, etc.): Hillside Local relief (concave, convex, none): Convex Slope %: 5
Subregion (LRR or MLRA): LRR R, MLRA 139 Lat: 40.786119 Long: -81.436525 Datum: WGS84
Soil Map Unit Name: Chili silt loam, 2 to 6 percent slopes NWI classification: PSS1C
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No (If no, explain in Remarks.)
Are Vegetation N, Soil N, or Hydrology N significantly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation N, Soil N, or Hydrology N naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <u> </u> No <u>X</u>	Is the Sampled Area within a Wetland? Yes <u> </u> No <u>X</u> If yes, optional Wetland Site ID: <u>N/A</u>
Hydric Soil Present? Yes <u> </u> No <u>X</u>	
Wetland Hydrology Present? Yes <u> </u> No <u>X</u>	
Remarks: (Explain alternative procedures here or in a separate report.) NWI investigation point	

HYDROLOGY

Wetland Hydrology Indicators: <u>Primary Indicators</u> (minimum of one is required; check all that apply) <u> </u> Surface Water (A1) <u> </u> Water-Stained Leaves (B9) <u> </u> High Water Table (A2) <u> </u> Aquatic Fauna (B13) <u> </u> Saturation (A3) <u> </u> Marl Deposits (B15) <u> </u> Water Marks (B1) <u> </u> Hydrogen Sulfide Odor (C1) <u> </u> Sediment Deposits (B2) <u> </u> Oxidized Rhizospheres on Living Roots (C3) <u> </u> Drift Deposits (B3) <u> </u> Presence of Reduced Iron (C4) <u> </u> Algal Mat or Crust (B4) <u> </u> Recent Iron Reduction in Tilled Soils (C6) <u> </u> Iron Deposits (B5) <u> </u> Thin Muck Surface (C7) <u> </u> Inundation Visible on Aerial Imagery (B7) <u> </u> Other (Explain in Remarks) <u> </u> Sparsely Vegetated Concave Surface (B8)		<u>Secondary Indicators</u> (minimum of two required) <u> </u> Surface Soil Cracks (B6) <u> </u> Drainage Patterns (B10) <u> </u> Moss Trim Lines (B16) <u> </u> Dry-Season Water Table (C2) <u> </u> Crayfish Burrows (C8) <u> </u> Saturation Visible on Aerial Imagery (C9) <u> </u> Stunted or Stressed Plants (D1) <u> </u> Geomorphic Position (D2) <u> </u> Shallow Aquitard (D3) <u> </u> Microtopographic Relief (D4) <u> </u> FAC-Neutral Test (D5)
Field Observations: Surface Water Present Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> Water Table Present Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> Saturation Present Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> (includes capillary fringe)	Wetland Hydrology Present? Yes <u> </u> No <u>X</u>	
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:		
Remarks:		

VEGETATION – Use scientific names of plants.

Sampling Point: SP2

<u>Tree Stratum</u> (Plot size: <u>30 ft</u>)	<u>Absolute % Cover</u>	<u>Dominant Species</u>	<u>Indicator Status</u>																	
1. <u>Acer saccharinum</u>	<u>60</u>	<u>Yes</u>	<u>FACW</u>	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>3</u> (A) Total Number of Dominant Species Across All Strata: <u>8</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>37.5</u> (A/B)																
2. <u>Ulmus americana</u>	<u>20</u>	<u>Yes</u>	<u>FACW</u>																	
3. _____	_____	_____	_____																	
4. _____	_____	_____	_____																	
5. _____	_____	_____	_____																	
6. _____	_____	_____	_____																	
7. _____	_____	_____	_____																	
<u>80</u> = Total Cover				Prevalence Index worksheet: <table style="width: 100%;"> <tr> <th style="width: 50%;">Total % Cover of:</th> <th style="width: 50%;">Multiply by:</th> </tr> <tr> <td>OBL species <u>0</u></td> <td>x 1 = <u>0</u></td> </tr> <tr> <td>FACW species <u>80</u></td> <td>x 2 = <u>160</u></td> </tr> <tr> <td>FAC species <u>20</u></td> <td>x 3 = <u>60</u></td> </tr> <tr> <td>FACU species <u>50</u></td> <td>x 4 = <u>200</u></td> </tr> <tr> <td>UPL species <u>20</u></td> <td>x 5 = <u>100</u></td> </tr> <tr> <td>Column Totals: <u>170</u> (A)</td> <td><u>520</u> (B)</td> </tr> <tr> <td colspan="2" style="text-align: center;">Prevalence Index = B/A = <u>3.06</u></td> </tr> </table>	Total % Cover of:	Multiply by:	OBL species <u>0</u>	x 1 = <u>0</u>	FACW species <u>80</u>	x 2 = <u>160</u>	FAC species <u>20</u>	x 3 = <u>60</u>	FACU species <u>50</u>	x 4 = <u>200</u>	UPL species <u>20</u>	x 5 = <u>100</u>	Column Totals: <u>170</u> (A)	<u>520</u> (B)	Prevalence Index = B/A = <u>3.06</u>	
Total % Cover of:	Multiply by:																			
OBL species <u>0</u>	x 1 = <u>0</u>																			
FACW species <u>80</u>	x 2 = <u>160</u>																			
FAC species <u>20</u>	x 3 = <u>60</u>																			
FACU species <u>50</u>	x 4 = <u>200</u>																			
UPL species <u>20</u>	x 5 = <u>100</u>																			
Column Totals: <u>170</u> (A)	<u>520</u> (B)																			
Prevalence Index = B/A = <u>3.06</u>																				
<u>60</u> = Total Cover																				
<u>Sapling/Shrub Stratum</u> (Plot size: <u>15 ft</u>)																				
1. <u>Lonicera maackii</u>	<u>20</u>	<u>Yes</u>	<u>UPL</u>																	
2. <u>Rosa multiflora</u>	<u>20</u>	<u>Yes</u>	<u>FACU</u>																	
3. <u>Celtis occidentalis</u>	<u>20</u>	<u>Yes</u>	<u>FAC</u>																	
4. _____	_____	_____	_____																	
5. _____	_____	_____	_____																	
6. _____	_____	_____	_____																	
7. _____	_____	_____	_____																	
<u>60</u> = Total Cover																				
<u>Herb Stratum</u> (Plot size: <u>5 ft</u>)																				
1. <u>Poa pratensis</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>	Hydrophytic Vegetation Indicators: <u>1</u> - Rapid Test for Hydrophytic Vegetation <u>2</u> - Dominance Test is >50% <u>3</u> - Prevalence Index is ≤3.0 ¹ <u>4</u> - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <u> </u> Problematic Hydrophytic Vegetation ¹ (Explain) <small>¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.</small>																
2. <u>Glechoma hederacea</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>																	
3. _____	_____	_____	_____																	
4. _____	_____	_____	_____																	
5. _____	_____	_____	_____																	
6. _____	_____	_____	_____																	
7. _____	_____	_____	_____																	
8. _____	_____	_____	_____																	
9. _____	_____	_____	_____																	
10. _____	_____	_____	_____																	
11. _____	_____	_____	_____																	
12. _____	_____	_____	_____																	
<u>10</u> = Total Cover																				
<u>Woody Vine Stratum</u> (Plot size: <u>30 ft</u>)																				
1. <u>Vitis aestivalis</u>	<u>20</u>	<u>Yes</u>	<u>FACU</u>																	
2. _____	_____	_____	_____																	
3. _____	_____	_____	_____																	
4. _____	_____	_____	_____																	
<u>20</u> = Total Cover																				

 Remarks: (Include photo numbers here or on a separate sheet.)
 rest is bareground

SOIL

Sampling Point: SP2

[illegible]

Representative Photographs
October 6, 2023

APPENDIX D REPRESENTATIVE PHOTOGRAPHS

AEP South Canton – West Canton 138kV Transmission Line Project
Ecological Survey Report
Stark County, Ohio



Photo Location 1. View of wetland determination sample point (SP1; upland) and existing roadway and maintained lawn habitats. Photograph taken facing east.



Photo Location 1. View of wetland determination sample point (SP1; upland), soil profile.



AEP South Canton – West Canton 138kV Transmission Line Project
Ecological Survey Report
Stark County, Ohio



Photo Location 1. View of industrial land and maintained lawn habitats. Photograph taken facing south.



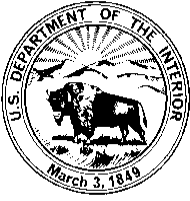
Photo Location 2. View of wetland determination sample point (SP2; upland). Photograph taken facing west.



Photo Location 2. View of wetland determination sample point (SP2; upland), soil profile.

Agency Correspondence
October 6, 2023

APPENDIX E AGENCY CORRESPONDENCE



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994



August 25, 2023

Project Code: 2023-0112252

Dear Kim Catano:

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened, endangered, and proposed species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The bat faces extinction due to the impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. During spring, summer, and fall, this species roosts primarily among leaf clusters of live or recently dead trees, emerging at dusk to hunt for insects over waterways and forest edges. While white-nose syndrome is by far the most serious threat to the tricolored bat, other threats now have an increased significance due to the dramatic decline in the species' population. These threats include disturbance to bats in roosting, foraging, commuting, and over-wintering habitats. Mortality due to collision with wind turbines, especially during migration, has also been documented across their range. Conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats and northern long-eared bats. If Indiana bats and northern long-eared bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

A handwritten signature in blue ink that reads "Angela L. Boyer". The signature is fluid and cursive, with the first name "Angela" and last name "Boyer" clearly legible.

Angela Boyer
Acting Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Eileen Wyza, ODNR-DOW



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6661
Fax: (614) 267-4764

September 21, 2023

Kim Catano
Stantec Consulting Services Inc.
1500 Lake Shore Drive, Suite 100
Columbus, Ohio 43204

Re: 23-0973; AEP South Canton - West Canton 138kV Transmission Line

Project: The proposed project involves the modification of the South Canton-West Canton 138kV double circuit line near Structure 58 to account for station work at Reedurban.

Location: The proposed project is located in Perry Township, Stark County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state, or federal agency nor relieve the applicant of the obligation to comply with any local, state, or federal laws or regulations.

Natural Heritage Database: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that Best Management Practices be utilized to minimize erosion and sedimentation.

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the

leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "[OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING](#)". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the long-solid (*Fusconaia maculata maculata*), a state endangered mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

The project is within the range of the Iowa darter (*Etheostoma exile*), a state endangered fish. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonius*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

ODNR appreciates the opportunity to provide these comments. Please contact Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

4/16/2025 4:53:52 PM

in

Case No(s). 25-0093-EL-BNR

Summary: Application Construction Notice South Canton-West Canton
electronically filed by Hector Garcia-Santana on behalf of Ohio Power Company.